

ESTTA Tracking number: **ESTTA553065**

Filing date: **08/08/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding.	91199169
Applicant	Plaintiff Boston Red Sox Baseball Club Limited Partnership
Other Party	Defendant Rensselaer Polytechnic Institute
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Close of Discovery is currently set to close on 09/23/2013. Boston Red Sox Baseball Club Limited Partnership requests that such date be extended for 90 days, or until 12/22/2013, and that all subsequent dates be reset accordingly.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	11/22/2013
Discovery Closes :	12/22/2013
Plaintiff's Pretrial Disclosures :	02/05/2014
Plaintiff's 30-day Trial Period Ends :	03/22/2014
Defendant's Pretrial Disclosures :	04/06/2014
Defendant's 30-day Trial Period Ends :	05/21/2014
Plaintiff's Rebuttal Disclosures :	06/05/2014
Plaintiff's 15-day Rebuttal Period Ends :	07/05/2014

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*
- *Parties are engaged in settlement discussions*
- *The parties are engaged in the discovery process. Applicant served its requests on July 31, 2013. However, due to the massive amount of materials that will need to be gathered, covering an extensive period of time, Opposer needs additional time to respond to discovery, as well as to complete discovery. (Additionally, the parties have also had substantive settlement discussions, and Opposer's counsel is in the process of reviewing an agreement, which, if accepted, would obviate the need to continue with the opposition). The parties therefore request the extension in order to allow time to complete the discovery process and to work towards settlement of this matter.*

Boston Red Sox Baseball Club Limited Partnership has secured the express consent of all other parties to

this proceeding for the extension and resetting of dates requested herein.

Boston Red Sox Baseball Club Limited Partnership has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Respectfully submitted,

/Aryn M. Emert/

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